



April 12, 2012

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Notice of *Ex Parte* Communication  
MM Docket Nos. 00-168 and 00-44

Dear Ms. Dortch:

On April 10, 2012, Gordon Smith and the undersigned of the National Association of Broadcasters (NAB) met with Chairman Genachowski, Sherrese Smith, William Lake and Zachary Katz of the Federal Communications Commission to discuss NAB's position regarding on-line public files. The focus of this meeting was the political file portion of the public file.

NAB reiterated its position that the Commission should not reverse its 2007 decision to exempt broadcast political files from any requirement to place the larger public files of broadcast television stations in an on-line database to be housed at the FCC. While recognizing the Chairman's goal of increasing the transparency of the public files, the NAB parties pointed out that broadcasters are concerned about the potential misuse of the political file to put television broadcasters at a disadvantage in the highly competitive commercial video marketplace. We further noted that the statutory requirements for political files require only that the information be available at the station and that the statute contemplates that the Federal Elections Commission should be the on-line locus for election information. NAB pointed out that requiring broadcaster political files to be placed on-line at the FCC would necessarily have implications for federal elections.

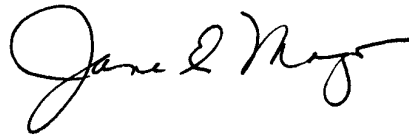
Finally, the parties also discussed whether there could be an approach under which broadcasters would retain full political files as they currently do at the stations, but place information without specific individual rates in the FCC database. In a follow-up discussion between Jane Mago and William Lake on April 11, Ms. Mago suggested that one way to accomplish this might be to allow broadcasters to retain specific

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Marlene H. Dortch  
April 12, 2012  
Page 2

invoice information only at the station, but file with the FCC a form like the NAB's political broadcast advertising form PB-17 insofar as it provides information on total charges for political ad buys.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jane E. Mago". The signature is fluid and cursive, with the first name "Jane" being more prominent than the last name "Mago".

Jane E. Mago  
Executive Vice President & General Counsel  
National Association of Broadcasters

cc: Chairman Julius Genachowski  
Sherrese Smith  
William Lake  
Zachary Katz